

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Case No. 20-CR-181 (3) (PJS/BRT)

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United States of America,

Plaintiff,

v.

**DEFENDANT WILLIAMS’S MOTION  
FOR A DOWNWARD DEPARTURE**

Bryce Michael Williams,

Defendant.

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The Defendant, Bryce Michael Williams, through his undersigned counsel, respectfully moves this Court for a downward departure on the “aberrant behavior” ground, specifically that the offense was a “single criminal occurrence or single criminal transaction that (1) was committed without significant planning; (2) was of limited duration; and (3) represents a marked deviation by the defendant from an otherwise law-abiding life.” U.S.S.G. § 5K2.20.

This motion is made on all the files and records in the case, the Defendant’s Position Regarding Sentencing, the United States Sentencing Guidelines, and upon such other and further points and authorities as may be presented to the Court.

Respectfully submitted,

Dated: March 9, 2021

/s/ Ian S. Birrell

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